

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JEEUN FRIEL, Individually and on behalf of
all others similarly situated,

Plaintiff,

-against-

DAPPER LABS, INC. and ROHAM
GHAREGOZLOU,

Defendants.

Case No. 1:21-cv-05837-VM

ORAL ARGUMENT
REQUESTED

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendants' Motion to Dismiss, Request for Judicial Notice in Support of Defendants' Motion to Dismiss pursuant to Fed. R. Evid. 201(b), and Declaration of Erin Zatlin in Support of Defendants' Request for Judicial Notice, Defendants Dapper Labs, Inc. and Roham Gharegozlou will move this Court, before the Honorable Victor Marrero, at Daniel Patrick Moynihan U.S. Courthouse, 500 Pearl Street, Room 2260, New York, New York, 10007, on a date and time to be determined by the Court, for an Order, under Fed. R. Civ. P. 12(b)(6), dismissing with prejudice the claims asserted against them in this action, taking judicial notice of the incorporated documents, and granting such other relief as the Court deems just and proper. Defendants request oral argument.

Dated: San Francisco, California
August 30, 2022

Respectfully submitted,

PAUL HASTINGS LLP

/s/ Kenneth P. Herzinger

Kenneth P. Herzinger

Sean D. Unger (*Pro Hac Vice*)

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